

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PRINCETON INDUSTRIAL)	
PRODUCTS, INC., <i>an Illinois</i>)	
<i>corporation,</i>)	
)	Civil Action No. 13-cv-7160
Plaintiff,)	
)	The Honorable Jeffrey Cole
vs.)	Magistrate & Presiding Judge
)	
)	
PRECISION METALS CORP.,)	
<i>a New York corporation,</i>)	
)	
Defendant.)	

**PLAINTIFF'S MOTION FOR ENTRY OF JUDGMENT
AGAINST DEFENDANT FOR DAMAGES**

Plaintiff Princeton Industrial Products, Inc. (“Princeton”) respectfully requests that this Court enter an order of judgment for Princeton and against Defendant Precision Metals Corp. (“PMC”) for damages in the amount of \$95,603.43 in the above-captioned matter. In support of its motion, Princeton states as follows:

1. On August 17, 2015, this Court granted Princeton’s Motion for Summary Judgment on liability for the parts ordered by and shipped to PMC, but not paid for. (Dkts. 102, 103).
2. PMC does not dispute the amount of parts that Princeton shipped to it. (Dkt. 91 at p. 5-18).
3. Princeton regularly keeps records of purchase orders from Princeton’s customers, the amount of parts shipped to those customers, the dates those parts were shipped, and the invoice numbers and payments made to Princeton. These records are made at the time the orders

and shipments occur, the invoices are sent and the payments are received. See Affidavit of Kendall Knapik, ¶3 attached as Exhibit A hereto.

4. The total amount billed to PMC for the parts at issue in this matter (parts 619550, 6108317, 5174125, 6166552, 12972429-1, 12972429-2, 12972429-3, 6650757 and 5139989) minus the amount paid by PMC is equal to \$100,686.06. From this total, Princeton deducted \$4,504.95, the amount that PMC paid Princeton for thread gauges, and \$577.68, the amount of alleged overshipments by Princeton of parts 6650757 and 5139989 to PMC, and therefore, the total amount PMC owes Princeton is equal to \$95,603.43. Exhibit A, ¶4.

5. Pursuant to 28 USCS § 1920, Princeton is entitled to its costs for filing fees in the amount of \$400.00. (Dkt. 1).

WHEREFORE, Princeton respectfully requests that this Court enter an order of judgment for Princeton and against PMC for damages in the amount of \$95,603.43 and for filing fees in the amount of \$400.00, and provide such further relief as the Court deems appropriate.

November 4, 2015

Respectfully submitted,

PRINCETON INDUSTRIAL
PRODUCTS, INC.

By: /s/ Rebecca A. Edwards
One of Its Attorneys

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Attorneys for Plaintiff

EXHIBIT A

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NORTHERN DISTRICT OF ILLINOIS
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PRINCETON INDUSTRIAL)
PRODUCTS, INC., *an Illinois*)
corporation,)
Plaintiff,) Civil Action No. 13-cv-7160
vs.) The Honorable Jeffrey Cole
PRECISION METALS CORP.,) Magistrate & Presiding Judge
a New York corporation,)
Defendant.)

AFFIDAVIT OF KENDALL KNAPIK

I, Kendall Knapik, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

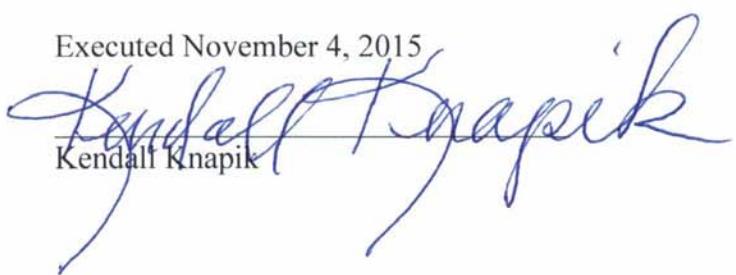
1. I was the office manager of Plaintiff Princeton Industrial Products, Inc. ("Princeton") from January 2003 through December 2012.
2. I have personal knowledge of the matters set forth in this affidavit and, if sworn as a witness, can testify competently thereto. I am over 21 years old.
3. Princeton regularly keeps records of purchase orders from Princeton's customers, the amount of parts shipped to those customers, the dates those parts were shipped, and the invoice numbers and payments made to Princeton. These records are made at the time the orders and shipments occur, the invoices are sent and the payments are received.

4. I have reviewed Princeton's records, and, based upon those records concerning payments made by Defendant Precision Metal Corp. ("PMC") for each of the following parts: 619550, 6108317, 5174125, 6166552, 12972429-1, 12972429-2, 12972429-3, 6650757 and

5139989, which are in dispute in this case, the total amount billed to PMC for these parts minus the amount paid by PMC is equal to \$100,686.06. From this total, I deducted \$4,504.95, the amount that PMC paid Princeton for thread gauges, and \$577.68, the amount of alleged overshipments by Princeton of parts 6650757 and 5139989 to PMC, and therefore, the total amount PMC owes Princeton is equal to \$95,603.43.

I verify under penalty of perjury that the foregoing is true and correct.

Executed November 4, 2015



Kendall Knapik